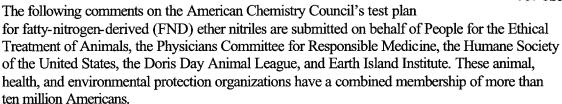
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June 21, 2004

Michael O. Leavitt, Administrator U.S. Environmental Protection Agency Ariel Rios Bldg. (1101A) 1200 Pennsylvania Ave. NW Washington, DC 20460

Comments on the HPV test plan for the fatty-nitrogen-derived ether nitriles category

Dear Administrator Leavitt:



We commend the ACC's decision to read data across from the FND nitriles category to the FND ether nitriles category, and thus obviate the perceived need for further testing of compounds in the latter category. This decision is in keeping with the October 14, 1999 guidance from the EPA to chemical manufacturers and importers, which states that "participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships" (http://www.epa.gov/chemrtk/ceoltr2.htm). However, please also see our comments and concerns on the ACC's proposed test plan for the FND nitriles category.

Sincerely,

Jessica Sandler Federal Agency Liaison



HEADQUARTERS 501 FRONT ST. NORFOLK, VA 23510 757-622-PETA 757-628-0781 (FAX)

